

MEMO ENDORSED



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 13, 2021

BY ECF and EMAIL

Honorable Andrew L. Carter, Jr.
United States District Court for the
Southern District of New York
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 5/14/21

Re: *United States v. Jose Reyes*, 20 Cr. 617 (ALC)

Dear Judge Carter:

The Government writes, on behalf of the parties, to request that the Court schedule an initial conference in this matter. Defense counsel has informed the Government that she intends to make a bail application at that conference. Furthermore, the Government respectfully requests that the Court exclude time under the Speedy Trial Act until the date of the next conference. Defense counsel consents to this request.

On April 29, 2021, the defendant was arraigned on Indictment 20 Cr. 617 (ALC) before Magistrate Judge Netburn and entered a plea of not guilty. The defendant consented to detention without prejudice. The parties have conferred and are available: the afternoon of May 17, the morning of May 19, any time on May 24 or May 27, after 11:00 a.m. on June 1, and the afternoon on June 7.

The Government is preparing its initial production of Rule 16 material, which it intends to make shortly. Accordingly, the Government submits that the ends of justice served by an exclusion of time until the date of the next conference outweigh the best interests of the public and the defendant in a speedy trial, because such an exclusion will allow the Government time to produce discovery, time for the defense to review, and time for the defense to otherwise prepare for the conference and for trial. Defense counsel consents to this request.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: Justin V. Rodriguez
Justin V. Rodriguez
Assistant United States Attorney
(212) 637-2591

cc: Counsel of record (by ECF)

The application is **GRANTED**. A telephone status conference/bail hearing is set for May 27, 2021 at 12:00 p.m. The parties should contact the Court at 1-888-363-4749 on the date and time specified above and once prompted, should dial access code 3768660. Time excluded. So Ordered.

Anne S. Casner
5-14-21